

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

August 1, 2018

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs"), write to respectfully request a brief extension of the deadline for plaintiffs to respond to the July 31, 2018 letter motion ("letter motion") of the Kingdom of Saudi Arabia ("Kingdom"). (ECF No. 4077).

Earlier today, the Court entered an Order prohibiting the public filing on the docket of any document designated as Confidential by the Kingdom while the Court considers the Kingdom's letter motion, and setting an August 8, 2018 deadline for plaintiffs' to respond to that motion. (ECF No. 4097). The PECs respectfully request an extension of the deadline for filing their response up to and including August 21, 2018.

The proposed extension is needed to properly respond to the motion and give plaintiffs an opportunity to conduct a preliminary review of the documents designated as confidential by the Kingdom. With regard to that review, the PECs note that the Kingdom produced the entirety of its document production – comprising 6,674 total pages, virtually all in Arabic – contemporaneous with the filing of its letter motion last night. Prior to last night's production, the Kingdom did not produce any documents on a rolling basis, as contemplated by this Court's May 24, 2018 Order. *See* ECF No. 4009 (The Kingdom of Saudi Arabia "shall produce an initial round of documents and interrogatory responses on a rolling basis and shall complete that production by July 31, 2018"). As a result, the PECs were not in a position to begin their review of the Kingdom's production and assessment of the nature of the documents that have been marked as confidential until today.

The Honorable Sarah Netburn

August 1, 2018

Page 2

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Given that the Court already has issued its Order prohibiting the public filing of any document designated as confidential by the Kingdom while the Court considers the Kingdom's letter motion, the Kingdom has advised that it has no objection to the proposed extension.

The PECs thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

MOTLEY RICE

/s/ Robert T. Haefele

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MDL 1570 Plaintiffs' Exec. Committee for  
Personal Injury and Death Claims

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/s/ Andrew J. Maloney

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MDL 1570 Plaintiffs' Exec. Committee for  
Personal Injury and Death Claims

cc: All MDL Counsel of Record (via ECF)

COZEN O'CONNOR

/s/ Sean P. Carter, Esquire

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MDL 1570 Plaintiffs' Exec. Committee for  
Commercial Claims